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August 3, 2018

VIA ECF

The Honorable Kiyo Matsumoto
United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Greebel, S1 15 Cr. 637 (E.D.N.Y.) (KAM)

Dear Judge Matsumoto:

We respectfully request permission to respond to the government in three pages or less on the sole issue of restitution. Since it is the government's burden to prove restitution, it would have been awkward for us to anticipate the government's arguments in our sentencing submission before the government actually made them. Accordingly, our opposition to the government's restitution request was timely. Since the government is seeking an amount in restitution that will impoverish Evan Greebel and his family for the rest of his life, the issue is of the utmost importance. And since the Supreme Court's decision in *Lagos v. United States* reversed decades of Second Circuit case law interpreting the MVRA, and the issue of whether a corporate entity can be considered a "victim" has not been raised or addressed by any federal court since *Lagos*, we believe the Court would benefit from further briefing on the issue. We respectfully request permission to submit our response by no later than August 8, 2018.

Respectfully submitted,

/s/ Reed Brodsky

Reed Brodsky